

## REMARKS

### I. Introduction

In response to the Office Action dated February 7, 2007, claims 3-4, 10-11, and 17-18 have been amended and claims 9 and 16 have been cancelled. Claims 1, 3-8, 10-15, and 17-21 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Claim Amendments

Applicants' attorney has made amendments to the claims as indicated above. These amendments were made solely for the purpose of clarifying the language of the claims, and were not required for patentability or to distinguish the claims over the prior art.

### III. Prior Art Rejections

In paragraphs (3)-(4) of the Office Action, claims 1, 8, and 15 were rejected under 35 U.S.C. §102(b) as being anticipated by Kashiwagi, U.S. Patent No. 6,037,939 (Kashiwagi). In paragraphs (5)-(7) of the Office Action, claims 1, 3-8, 10-15, and 17-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Clevenger et al.,

[http://www.daz3d.com/program/bryce/Bryce5\\_Manual\\_DAZ.pdf](http://www.daz3d.com/program/bryce/Bryce5_Manual_DAZ.pdf) (Clevenger) in view of Parametric Technology Corporation et al.,

[http://www.ptc.com/company/mailexpress2002021download\\_guide.htm](http://www.ptc.com/company/mailexpress2002021download_guide.htm) (Parametric). On page (8), paragraph (6) of the Office Action, claims 7, 14, and 21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Clevenger in view of SkySof Software, CAD.OCX 1; [http://www.d ownload.co m/CAD-0 CX/3000-6677\\_4-1400022. html?tag=1<sup>st</sup>-2-1](http://www.d ownload.co m/CAD-0 CX/3000-6677_4-1400022. html?tag=1<sup>st</sup>-2-1) (SkySof).

Specifically, the independent claims were rejected as follows:

As to independent claims 1, 8, and 15, Clevenger teaches a method and corresponding apparatus and article for displaying a graphical illustration of an object in a computer graphics program (PDF page 129, column 1, paragraph 5), comprising elements, steps and means for: a computer having a memory (PDF pg. 12, col.1 and PDF pg. 126, par. 5); an application executing on the computer, wherein the application is configured to obtaining an object in a computer graphics program (PDF pg. 129, col. 1, par. 6); displaying a properties palette for the object (PDF pg. 130, Figure 1, col. 1), wherein the properties palette comprises one or more object properties having corresponding property values (PDF pg. 131, col. 1, par. last and col. 2 par. 1-2); displaying a graphical illustration of the object in the properties palette (PDF pg. 130, Figure 1). Clevenger teaches the use of keynotes of object properties within the same window/ palette (pages 230-238). Clevenger does not specifically mention the use of keynotes in the object palette. However in the same field of endeavor PTC teaches wherein one or more of the object properties, in the properties palette, are

keynoted to refer to corresponding keynotes displayed in the graphical illustration in the properties palette (PDF pg. 29, Fig. 1 and PDF pg. 172, Fig. 1; wherein the user selects an option from the palette to show a display view of an object with keynotes pointing to different parameters of the object, to where the keynotes are dictated in an organized manner to accommodate the user). It would have been obvious to one skilled in the art at the time of the invention to combine the keynotes of a three dimensional object for use of pointing out different parameters of a three dimensional object into the editing palette of a three dimensional object that has parameters associated by values as defined by a user of Clevenger. The motivation to combine being that of PTC is a program designed to accommodate a user in the design process of three dimensional modeling (PDF pg.20, par.3, line 1) which is in the same field of endeavor of Clevenger which also accommodates a user in the design process of three dimensional modeling. Of course, those skilled in the art will appreciate that the function and idea of providing a graphical indication of what the user is currently selecting is very well known and no longer novel.

**Note:** Clevenger teaches a means of keynoting, wherein a graphical indication is displayed to the user of controls and effected areas of the controls therein of a three-dimensional object (see pages 230-238). The object being displayed in the window also can be construed as being a palette as seen on page 8 of Clevenger, wherein is depicted editable controls with a display of a three dimensional object.

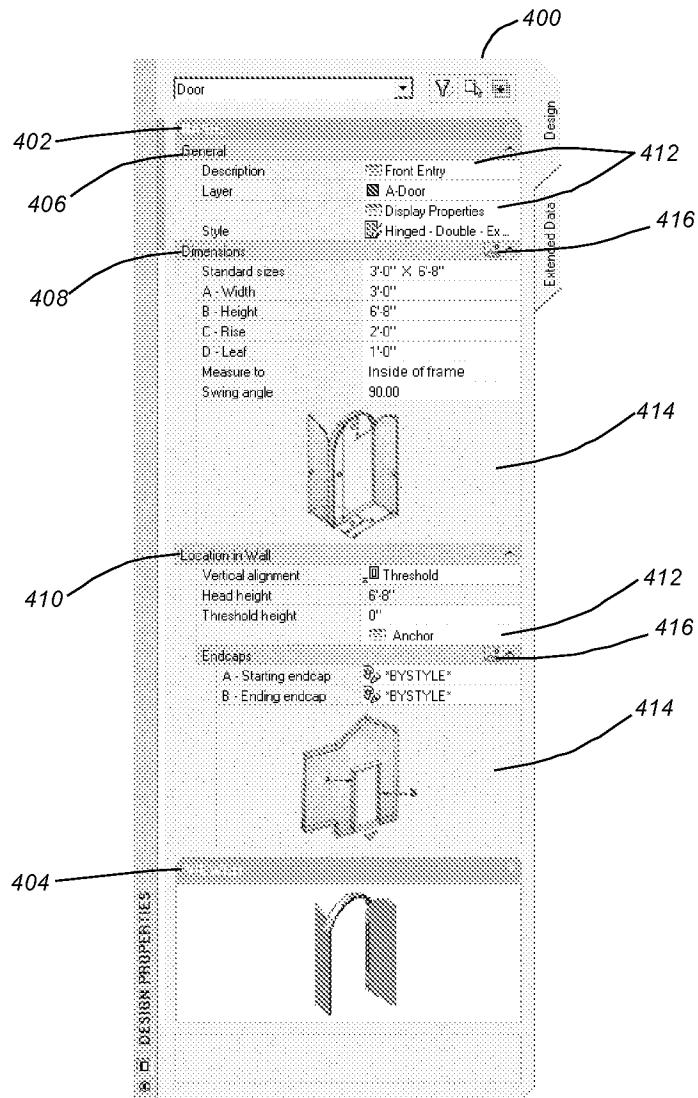
Applicants traverse the above rejections for one or more of the following reasons:

- (1) Kashiwagi, Kashiwagi, Parametric, and SkySof do not teach, disclose or suggest the use of keynotes in a properties palette; and
- (2) Kashiwagi, Kashiwagi, Parametric, and SkySof do not teach, disclose or suggest keynoting properties that are displayed in a properties palette.

Independent claims 1, 8 and 15 are generally directed to the use of a properties palette in a computer graphics program. More specifically, a properties palette having object properties and corresponding values for the object are displayed in a properties palette. In addition, a graphical illustration of the object is displayed in the properties palette. Further, the claims provide that the properties in the properties palette are keynoted to refer to keynotes displayed in the graphical illustration in the properties palette. Thus, from within the properties palette, you can graphically see which properties correspond to which actual attributes of the displayed object.

Applicants direct the attention of the Examiner to FIG. 4 of the present invention:

*FIG. 4*



Specifically, Applicants direct the attention of the Examiner to area 414 that shows keynoted illustrations. As shown, the properties in the tree 400 are keynoted to refer to the illustration 414. In FIG. 4, the width, height, rise, and leaf properties are keynoted to match the illustration 414. (See page 14, lines 5-12 (paragraphs [0049]-[0050]). Applicants further note that endcaps area 414 is also keynoted with the starting endcap and ending endcap having keynotes "A" and "B" which are both

illustrated in the object representation shown. Such a diagram clearly illustrates the scope and use of keynotes in accordance with the presently claimed invention.

The dependent claims further provide for changing various properties and the illustration within the properties will update to reflect the changes. Further, if a property is highlighted in the graphical illustration (e.g., a keynote is selected), the corresponding object property is highlighted (and vice versa).

In rejecting the keynote aspects of the claims, the Office Action relies on Kashiwagi's FIG. 2 items 105 and 112. Applicants direct the attention of the Examiner to col. 6, lines 20-64 which describe FIG. 2:

The overall image 1 includes a graphics display section 101, a controller section 102, and a title bar 106.

The graphics display section 101 displays graphical objects. Herein, a "graphical object" is defined as a visual representation of all or part of domain data stored in a domain data storage area 403a of the storage device 403 (shown in FIG. 6). In the present example, domain data includes outline data (which defines the outline of the object), color data which defines the color of the object), size data (which defines the size of the object), and position data (which defines the position of the object). A graphical object having an outline, color, size, and position corresponding to the respective outline, color, size, and position data included in the domain data is displayed by the graphics display section 101. In other words, each graphical object in the present example can be considered as an object (defined by the outline, color, size, and position data included in the domain data) being mapped onto the graphics display section 101. In the present example, the graphical objects are displayed as cubic shapes.

The graphics display section 101 also displays a cursor 105. The cursor 105 is used for selecting one of a plurality of graphical objects displayed by the graphics display section 101. The position of the cursor 105 can be moved by a user operating the mouse 406b, for example. Once a graphical object is selected by means of the cursor 105, a selection indicator 1012 is displayed, which denotes the selected graphical object. However, the selection indicator 1012 is erased from the graphics display section 101 if the user does not select any graphical objects or if the selection is cancelled.

The controller section 102 includes an object controller 103 for manipulating the attributes of a graphical object selected by the user and a graphics controller 104 for controlling the graphics displayed by the graphics display section 101.

The object controller 103 includes an outline selection portion 1031 for selecting the outline of an object in an exclusive manner, a color setting portion 1032 used for setting the color of the object, a size setting portion 1033 for setting the size of the object, and an object movement portion 1034 for moving the position of the object by a designated difference.

As can be seen from this text, Kashiwagi provides for using a cursor to select an object. Once an object has been selected, a selection indicator 1012 is displayed, which denotes the selected graphical object. However, what is completely and entirely lacking form Kashiwagi is any remote reference, explicit or implicit, to any form of a keynote.

The claims explicitly provide that a graphical illustration of an object is displayed in a properties palette. The only area of Kashiwagi's FIG. 2 that is remotely similar to a properties palette (or any palette) is that of object controller area 103. However, a graphical illustration of an object is not displayed in Kashiwagi's object control 103 (as claimed). Instead, the only graphic displayed in object control 103 is that of an outline selection portion 1031 that allows one to select an outline of an object in an exclusive manner. However, such an outline is not a graphical illustration of the object as set forth in the present claims.

The claims then explicitly provide that the object properties (in the properties palette) are keynoted to refer to corresponding keynotes displayed in the graphical illustration of the object (that is also displayed in the properties palette). Examining Kashiwagi's object control 103, it can clearly be seen that there are no keynotes whatsoever. In this regard, there is no keynote between the outline selection portion 1031 and the remaining properties 1032-1034 in the object control 103. In fact, there is not even a reference to a keynote anywhere in Kashiwagi. In this regard, electronic searches of the text of Kashiwagi for the term "keynote" or "key note" provided no results whatsoever. Without even mentioning the term keynote, Kashiwagi cannot possibly teach a claim that clearly utilizes and displays keynotes.

The Action attempts to equate Kashiwagi's graphical indication of an object being edited with the claimed keynotes. However, such an assertion is wholly without merit. The claims explicitly provide that the properties (in the properties palette) are keynoted to refer to corresponding keynotes displayed in a graphical illustration in the properties palette. Firstly, to meet the explicit claim limitations, Kashiwagi's object 105 must be displayed in a properties palette. Accordingly, the Office Action is asserting that area 101 is the properties palette. Such an assertion is wholly without merit. Area 101 does not contain any palette and does not contain any properties in a palette.

Nonetheless, for the sake of argument and assuming that area 101 qualifies as a properties palette (which Applicant's traverse), the graphical indication 1012 must be a keynote. However, to meet the explicit claim limitation, the selection 1012 must have a corresponding keynote that is displayed for an object property. As can be seen in FIG. 2, there is no corresponding keynote. Applicants note that the labels "1012", "105", etc. are merely used for annotating the drawings in the patent itself and are not displayed in Kashiwagi's actual product nor does Kashiwagi text assert

are even remotely allude that such labels are displayed. There are no keynotes or selection indicators displayed in object control 103. Thus, there is no corresponding keynotes as claimed.

In addition, Applicants note that the selection indicator 1012 disappears or is erased if the user does not select any graphical objects or if the selection is cancelled. Such a deselection does not and cannot teach the use of keynotes as claimed or as shown in FIG. 4 as described above.

Again, Kashiwagi completely and entirely fails to even remotely consider the use of keynotes in any way shape or form. Without even alluding to such keynotes, Kashiwagi cannot possibly teach the invention as claimed.

Further the remaining references fail to cure Kashiwagi's deficiencies.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Kashiwagi, Clevenger, Parametric, and SkySof. In addition, Applicants' invention solves problems not recognized by Kashiwagi, Clevenger, Parametric, and SkySof.

Thus, Applicants submit that independent claims 1, 8, and 15 are allowable over Kashiwagi, Clevenger, Parametric, and SkySof. Further, dependent claims 3-7, 10-14, and 17-21 are submitted to be allowable over Kashiwagi, Clevenger, Parametric, and SkySof in the same manner, because they are dependent on independent claims 1, 8, and 15, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 3-7, 10-14, and 17-21 recite additional novel elements not shown by Kashiwagi, Clevenger, Parametric, and SkySof.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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